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Attorney for Defendant
IL CHUNG

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IL CHUNG

Defendants.

CASE NO. 2:21-cr-00207-TLN

**STIPULATION REGARDING
CONTINUANCE OF STATUS
CONFERENCE; FINDINGS AND
ORDER**

STIPULATION

The defendant, Il Chung, by and through his counsel, Toni White, and the Government, by and through its counsel, Audrey Hemesath, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 28, 2022
2. By this stipulation, the above-named defendant now moves to continue the status conference until July 14, 2022, at 9:30 a.m., and to exclude time between April 28, 2022, and July 14, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Discovery in this case consists of approximately 24,000 pages of investigative reports in electronic form and some audio files. Additional discovery is forthcoming.
 - b) Defense counsel needs additional time to continue to review discovery, to continue to consult with her client, review the current charges, conduct investigation and research related

1 to the charges and to discuss potential resolutions with their clients and otherwise prepare for
2 trial.

3 c) Defense counsel believes that failure to grant the above-requested continuance would
4 deny her reasonable time necessary for effective preparation, taking into account the exercise
5 of due diligence.

6 d) The status conference for the co-defendant in this matter, Jong Eun Lee, is currently
7 set for July 14, 2022 and the request is that Mr. Chung's status be set for that same day.

8 e) The Government does not object to the continuance.

9 f) Based on the above-stated findings, the ends of justice served by continuing the case
10 as requested outweigh the interest of the public and the defendant in a trial within the original
11 date prescribed by the Speedy Trial Act.

12 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
13 seq., within which trial must commence, the time period of April 28, 2022 to July 14, 2022,
14 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendant's request on the
16 basis of the Court's finding that the ends of justice served by taking such action outweigh the
17 best interest of the public and the defendants in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of
2 the Speedy Trial Act dictate that additional time periods are excludable from the period within which
3 a trial must commence.

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5 IT IS SO STIPULATED.

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8 DATED: April 25, 2022

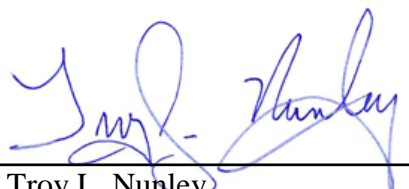
9 By /s/ Toni White for
AUDREY HEMESATH
Assistant United States Attorney

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11 DATED: April 25, 2022

12 By /s/ Toni White
TONI WHITE
Attorney for Defendant
13 IL CHUNG
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16 **FINDINGS AND ORDER**

17 IT IS SO FOUND AND ORDERED this 26th day of April, 2022.

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Troy L. Nunley
United States District Judge
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